

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

H. CRISTINA CHEN-OSTER; SHANNA
ORLICH; ALLISON GAMBA; and MARY DE
LUIS,

Plaintiffs,

-against-

GOLDMAN, SACHS & CO. and THE
GOLDMAN SACHS GROUP, INC.,

Defendants.

No. 10-cv-6950-AT-RWL

**NOTICE OF MOTION AND MOTION FOR RELIEF UNDER FEDERAL RULE OF
CIVIL PROCEDURE 23(d)**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Relief under Federal Rule of Civil Procedure 23(d) and the Declaration of Michael Levin-Gesundheit and the exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

1. Voiding arbitration clauses contained in 942 agreements between Class Members and Goldman, Sachs & Co. and/or The Goldman Sachs Group, Inc. (collectively, "Goldman") to arbitrate employment claims and/or waive participation in a class action that were purportedly executed after the filing of this lawsuit on September 15, 2010; and
2. Voiding releases of claims contained in 349 severance agreements between Class Members and Goldman executed after the filing of this lawsuit on September 15, 2010, to the extent the releases purport to cover claims that are the subject of this lawsuit.

Dated: April 12, 2019

By:

/s/ Kelly M. Dermody

Kelly M. Dermody

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